

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

QUANTUM COMMUNICATIONS
LTD,

Plaintiff,

v.

EAGLE FORUM EDUCATION AND
LEGAL DEFENSE FUND and
EDWARD R. MARTIN, JR.,

Defendants.

CASE NO. 1:17cv1640

(Honorable Malachy E. Mannion)

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiff, Quantum Communications, Ltd. (“Quantum”) and defendants, Eagle Forum Education and Legal Defense Fund (“EFELDF”) and Edward R. Martin, Jr. (“Martin”), pursuant to Rule 41 of the Federal Rules of Civil Procedure, respectively move the Court to dismiss this action with prejudice and in support thereof, state as follows:

1. Quantum, EFELDF and Martin have reached a resolution of this matter and have agreed to dismiss with prejudice all claims and counterclaims asserted by the parties with each party to bear their own costs and attorneys’ fees.

2. Quantum, EFELDF and Martin have entered into the attached Stipulation of Dismissal with prejudice.

WHEREFORE, Quantum, EFELDF and Martin, respectfully move the Court for entry of an Order dismissing with prejudice this action and all claims and counterclaims asserted therein with each party to bear their own costs and attorneys’ fees.

Dated: June 22, 2022

Respectfully submitted,

/s/ Timothy P. Ryan

Timothy P. Ryan, Esq.
1508 Fox Chase Lane
Pittsburgh, PA 15241
tprsar@comcast.net
(412) 418-1327

Counsel for Plaintiff, Quantum Communications Ltd.

/s/ Andrew L. Schlafly

Andrew L. Schlafly, Esq.
939 Old Chester Road
Far Hills, NJ 07931
aschlafly@aol.com
(908) 719-8608

Counsel for Eagle Forum Education and
Legal Defense Fund and Edward R. Martin, Jr.